

UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF NEW JERSEY

Caption in Compliance with D.N.J. LBR 9004-1(b)  
E. RICHARD DRESSEL, ESQUIRE (ED1793)  
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(856) 382-8211  
Attorneys for Andrew Sklar, Chapter 7 Trustee

In Re:

ORBIT ENERGY & POWER, LLC,  
  
Debtor.

Case No.: 22-19628(ABA)

Chapter: 7

Judge: Andrew B. Altenberg

Hrg. Date: 07/22/2025 @ 10:00 a.m.

**NOTICE OF MOTION OF ANDREW SKLAR, CHAPTER 7  
TRUSTEE, FOR THE ENTRY OF AN ORDER APPROVING MUTUAL  
RELEASE AND SETTLEMENT AGREEMENT WITH FULTON BANK  
(AS SUCCESSOR IN INTEREST TO REPUBLIC BANK)  
REGARDING SET-OFF OF FUNDS**

**PLEASE TAKE NOTICE on July 22, 2025 at 10:00 a.m.** or as soon thereafter as counsel may be heard, Andrew Sklar, Chapter 7 Trustee (the “Trustee”) in the instant Chapter 7 case, by and through his undersigned counsel, will move before the Honorable Andrew B. Altenburg, United States Bankruptcy Judge at the United States Bankruptcy Court, Mitchell Cohen Courthouse, 400 Cooper Street, 4<sup>th</sup> Floor, Courtroom 4B, Camden, NJ 08101, for the entry of an order approving mutual release and settlement agreement with Fulton Bank (as successor in interest to Republic Bank) regarding set-off of funds (the “Motion”).

**PLEASE TAKE FURTHER NOTICE** that in support of the Motion, the undersigned will rely on the Certification of Andrew Sklar submitted herewith pursuant to D. N. J. LBR 9013-1(a).

**PLEASE TAKE FURTHER NOTICE** that pursuant to D.N.J. LBR 9013-2, responsive papers, if any, must be filed with the Clerk of the Bankruptcy Court, U.S. Post Office and Courthouse, 401 Market Street, Camden, New Jersey 08101, and served upon the Trustee's undersigned counsel at Lex Nova Law LLC, 10 E. Stow Road, Suite 250, Marlton, NJ 08053, not later than **July 15, 2025** (seven (7) days prior to the return date of the Motion).

**PLEASE TAKE FURTHER NOTICE** that unless an objection is timely filed and served, the Motion shall be deemed uncontested in accordance with D.N.J. LBR 9013-3 and the relief sought herein may be granted without a hearing.

Date: June 20, 2025

/s/ E. Richard Dressel  
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